

Bradley T. Hunsicker (Wyo. Bar 7-4579)
MARKUS WILLIAMS YOUNG & ZIMMERMANN LLC
106 East Lincolnway, Suite 300
Cheyenne, WY 82001
Telephone: 307-778-8178
bhunsicker@markuswilliams.com

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:) Chapter 11
)
POWELL VALLEY HEALTH CARE, INC.,) Case No. 16-20326
)
Debtor-in-Possession.)

**FOURTH MOTION TO VACATE AND CONTINUE HEARING ON
DEBTOR’S MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE
DEBTOR TO ASSUME UNEXPIRED NON-RESIDENTIAL REAL PROPERTY
LEASES PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULE 6006 AND (II) ESTABLISHING CURE AMOUNT AND
THE OPPOSITION THERETO
(UNCONTESTED)**

Powell Valley Health Care, Inc. (“PVHC”, or the “Debtor”), the debtor and debtor in possession in the above captioned case, hereby files this motion to vacate and continue the hearing set for April 5, 2017, at 2:00 p.m., on the Debtor’s *Motion for Entry of an Order (I) Authorizing the Debtor to Assume Unexpired Non-Residential Real Property Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (II) Establishing Cure Amount* (the “Assumption Motion”) [Doc. 248] and the *Objection to Motion for Entry of an Order (I) Authorizing the Debtor to Assume Unexpired Non-Residential Real Property Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (II) Establishing Cure Amount, and Request for Evidentiary*

Hearing [Doc. 292] filed by the Official Committee of Unsecured Creditors (the “UCC”), and in support thereof shows the Court as follows:

1. The Debtor and the UCC are currently in the process of drafting, reviewing and revising an agreed upon Disclosure Statement, Plan and Plan related documents. The undersigned believes that the Debtor may file its Disclosure Statement and Plan as early as April 10, 2017.

2. Based on the foregoing, the Debtor believes that the interests of all parties would be better served if the parties focused their efforts on finalizing a Disclosure Statement, Plan and Plan related documents, rather than addressing the merits of the Assumption Motion.

3. Accordingly, the Debtor requests that the hearing on the Assumption Motion be vacated and continued for a period of approximately thirty (30) days.

4. The UCC and the Powell Hospital District have consented to the relief requested herein.

WHEREFORE, the Debtor respectfully requests the Court enter an order substantially in the form attached hereto at Exhibit A vacating and continuing the hearing on the Assumption Motion until a date on or after May 5, 2017.

Dated: April 4, 2017.

**MARKUS WILLIAMS YOUNG &
ZIMMERMANN LLC**

By: /s/ Bradley T. Hunsicker
Bradley T. Hunsicker (WY Bar No 7-4579)
106 East Lincolnway, Suite 300

Cheyenne, WY 82001
Telephone: 307-778-8178
Facsimile: 307-638-1975
Email: bhunsicker@markuswilliams.com

Counsel for the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

The undersigned certifies that on April 4, 2017, a copy of the foregoing was served *electronically* upon those parties indicated below:

**Attorneys for Official Committee of
Unsecured Creditors:**

Scott J. Goldstein
Philip A. Pearlman
Jamie N. Cotter
Spencer Fane
1000 Walnut Street, Suite 1400
Kansas City, MO 64106
1700 Lincoln Street, Suite 2000
Denver, CO 80203
sgoldstein@spencerfane.com
jcotter@spencerfane.com
ppearlman@spencerfane.com

Powell Hospital District:

Brent R. Cohen
Chad S. Caby
Lewis Roca Rothgerber LLP
1200 17th Street, Suite 3000
Denver, CO 80202-5855
ccaby@lrrc.com
bcohen@lrrc.com

/s/Bradley T. Hunsicker
Bradley T. Hunsicker